

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HIGROUND CO., LTD.; and HIGROUND
PTE LTD.,

Plaintiffs,

v.

HENRY HAN-WOONG LEE; GENESIS
DIGITAL ASSETS PTE, LTD.; GENESIS
GROUP PARTNERS, LLC; NEON
PARTNERS, LLC; STONEFORT
CONSULTANTS FZC; PETRO ECO
BUILD SDN BHD; WEST RANCH
CAPITAL MANAGEMENT; JULES
CORPORATION; JONATHAN CHAN;
NEON PARTNERS, LLC; GENESIS-NEON
GROUP, LLC;

Defendants.

Civil Action No.: 1:23-cv-08618-JSR

**DECLARATION OF COUNSEL
SEAN S. KWAK, ESQ.
IN SUPPORT OF MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

I, Sean S. Kwak, hereby declare the following under penalty of perjury.

1. I am a partner at the law offices of Kim, Lim & Partners. As such, I am familiar with the statements made herein.
2. Annexed hereto as Exhibit 1 is a true and correct copy of Exhibit A to the Amended Complaint, filed by Plaintiffs on December 15, 2023.
3. Annexed hereto as Exhibit 2 is a true and correct copy of the second page of Exhibit I to the Amended Complaint, filed by Plaintiffs on December 15, 2023.
4. Annexed hereto as Exhibit 3 is a true and correct copy of Exhibit G to the Amended Complaint, filed by Plaintiffs on December 15, 2023.
5. Annexed hereto as Exhibit 4 is a true and correct copy of Exhibit D to the Amended Complaint, filed by Plaintiffs on December 15, 2023.

6. Annexed hereto as Exhibit 5 is a true and correct copy of Exhibit R to the Amended Complaint, filed by Plaintiffs on December 15, 2023.
7. Annexed hereto as Exhibit 6 is a true and correct copy of Exhibit J to the Amended Complaint, filed by Plaintiffs on December 15, 2023.
8. Annexed hereto as Exhibit 7 is a true and correct copy of a printout of the online webpage available at the following url: <https://thelawdictionary.org/affiliate/>, last accessed February 6, 2024 at 10:37 a.m.
9. Annexed hereto as Exhibit 8 is a true and correct copy of Exhibit B to the Amended Complaint, filed by Plaintiffs on December 15, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 20, 2024

/s/ Sean S. Kwak
Sean S. Kwak